

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Transferring Bound Printed Matter Parcels
to the Competitive Product List

Docket No. MC2021-78

MOTION OF THE PUBLIC REPRESENTATIVE
FOR ISSUANCE OF INFORMATION REQUEST

(April 19, 2021)

Pursuant to 39 CFR §§ 3010.160(a) and 3010.170(e), the Public Representative respectfully requests that the Chairman issue an Information Request to obtain additional clarifying data and information from the Postal Service concerning its request to transfer Bound Printed Matter (BPM) Parcels from the Market Dominant product list to the Competitive product list. The proposed questions seek information that will allow participants to provide more constructive comments and evaluate whether the requested transfer meets the applicable legal and regulatory requirements. Accordingly, the Public Representative requests that the Chairman issue the following questions to help participants better understand the Postal Service's market power in the market segment in which BPM Parcels compete:

1. Please refer to Table 1 of the Request to Transfer Bound Printed Matter Parcels to the Competitive Product List, which indicates that 241,206,611 of the total 260,591,474 BPM Parcels shipped in FY 2020 were dropshipped.¹ Please also refer to Table 2 of the Request (filed under seal) which provides the top 20 BPM Parcel Mailers in FY 2020.² For each of the customers listed in Table 2, please provide the BPM Parcels volume that was dropshipped.

Respectfully submitted,

¹ United States Postal Service Request to Transfer Bound Printed Matter Parcels to the Competitive Product List, March 26, 2021, at 9 (Request).

² *Id.* at 11; see also Library Reference USPS-LR-MC2021-78/NP1, March 26, 2021.

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